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May 15, 1967

Mr. F. W. Irish, Chief
Division of Scientific Opinions
Bureau of Deceptive Practices
Federal Trade Commission
6th at Pennsylvania Avenue
Washington, D.C. 20580

Re: Bureau of the Budget
No. D56S 67004
File 662 3108

Dear Sir:

In compliance with your request, I am presenting a summary of my views on the cautionary regulations concerning cigarette smoking. I have been intently interested in pulmonary diseases for 35 years, have written two books and some 50 scientific articles on the subject, and believe that the conclusions of the Advisory Committee to the Surgeon General were unwarranted. I should also like to submit that the report of the Committee was biased in its omission of a plenitude of data challenging the etiologic relationship between smoking and disease.

It is my firm conviction that the statistical association between smoking and lung cancer is not proof of a causal relationship and that there is sufficient evidence indicating that the increase in lung cancer is due to improved diagnostic techniques and not exposure to smoking.

I have prepared this extensive review for your consideration so that you may realize that the subject is far more involved than is indicated in the authoritarian Report of the Advisory Committee. During recent years, research on lung cancer has yielded much valuable information but we are still a long way from establishing etiologic relationships. The search for scientific truth will not be advanced by legislative action based on illusory medical judgments.

Respectfully submitted,

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